



MOSKOWITZ & BOOK, LLP

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MEMO ENDORSED

November 19, 2020

11/23/20

By Email and ECF  
Hon. Colleen McMahon  
U.S. District Judge  
U.S. Courthouse  
500 Pearl Street  
New York, NY 10007

CASE Adjourned to January 27, 2020  
Time Excluded through January 27,  
in the interest of justice, to  
facilitate plea discussions.

Re: United States v. Jonathon Skolnick

~~19 Cr. 790 (CM)~~

19 Cr. 730 (cm)

Dear Judge McMahon:

Colleen McMahon

This letter is respectfully submitted on behalf of the parties to request an adjournment of the pre-trial conference currently scheduled to take place on December 2, 2020.

The parties are currently engaged in discussions in an attempt to reach a pretrial disposition. In that regard, the defense has made a voluminous submission to the Government and the Government has advised me that in light of the upcoming holiday season and the logistical difficulties posed by the pandemic, it will require a substantial amount of time to review the submission before formulating its position on a disposition.

In light of the above, the parties believe that it makes sense to adjourn the conference to a date in late January convenient to the Court and the parties, in the hope that by the next date, the parties will have determined whether the case can be resolved without a trial.

Thank you in advance for your consideration of this request.

Respectfully submitted,

Avraham C. Moskowitz

Avraham C. Moskowitz

cc: AUSA Elizabeth Espinosa (by email)  
AUSA Rebecca Dell (by email)

USDC SDNY  
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